

UNITED STATES DISTRICT COURT

for the
Southern District of Illinois

AMENDED COMPLAINT
22-CV-00887-JPG

DAVID F. BROWN #17579)
_____))
_____))
_____))
Plaintiff(s)/Petitioner(s))

Case Number: _____
(Clerk's Office will provide)

v.

☒ CIVIL RIGHTS COMPLAINT
pursuant to 42 U.S.C. §1983 (State Prisoner)
☐ CIVIL RIGHTS COMPLAINT
pursuant to 28 U.S.C. §1331 (Federal Prisoner)
☐ CIVIL COMPLAINT
pursuant to the Federal Tort Claims Act, 28 U.S.C.
§§1346, 2671-2680, or other law

JOHN LAKIN - SHERIFF)
CAPTAIN - CHRISTOPHER THARP)
CAPTAIN - STEPHEN RIDINGS)
AND STAFF ET AL)
Defendant(s)/Respondent(s)

I. JURISDICTION

Plaintiff: DAVID F. BROWN #17579

A. Plaintiff's mailing address, register number, and present place of
confinement. 405, RADDLE ST.

EDWARDSVILLE, IL 62025
(MADISON COUNTY JAIL)

Defendant #1:

B. Defendant JOHN LAKIN is employed as
(a) (Name of First Defendant)

SHERIFF, OF MADISON COUNTY
(b) (Position/Title)

with MADISON COUNTY SHERIFF'S DEPARTMENT
(c) (Employer's Name and Address)

405, RADDLE ST. EDWARDSVILLE, IL 62025

At the time the claim(s) alleged this complaint arose, was Defendant #1
employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain: AS FAR AS I KNOW
MR. JOHN LAKIN, IS A ELECTED OFFICIAL.. I THINK
HE'S LOCAL..

Defendant #2:

C. Defendant KRISTOPHER THARP is employed as

(Name of Second Defendant)

CAPT./MADISON COUNTY JAIL, ADMINISTRATOR
(Position/Title)

with MADISON COUNTY SHERIFF'S DEPT./MADISON COUNTY JAIL
(Employer's Name and Address)

405, RANDLE ST. EDWARDSVILLE, ILLINOIS 62025

At the time the claim(s) alleged in this complaint arose, was Defendant #2
employed by the state, local, or federal government? ☐ Yes ☒ No

If your answer is YES, briefly explain: N/A

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

~~██████████~~ STEPHEN RIDZULES
CAPT./MADISON COUNTY JAIL, SUPERINTENDENT
MADISON COUNTY SHERIFF'S DEPT./MADISON COUNTY JAIL
405, RANDLE ST. EDWARDSVILLE, ILLINOIS 62025
(STAFF) L.T. JOHN DOE
MADISON COUNTY SHERIFF'S DEPT./MADISON COUNTY JAIL
405, RANDLE ST. EDWARDSVILLE, IL 62025
Sgt. JOHN DOE
MADISON COUNTY SHERIFF'S DEPT./MADISON COUNTY JAIL
405, RANDLE ST. EDWARDSVILLE, IL 62025
OFFICER, DECKER # BADGE # NO. UNKNOWN,
MADISON COUNTY SHERIFF'S DEPT./MADISON COUNTY JAIL
405, RANDLE ST. EDWARDSVILLE, IL 62025
NOTE: EVERYBODY IN THERE (INDIVIDUAL AND
OFFICIAL CAPACITY) THANK YOU!

II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court while you were in prison or jail (during either your current or a previous time in prison or jail), e.g., civil actions brought under 42 U.S.C. § 1983 (state prisoner), 28 U.S.C. § 1331 (federal prisoner), 28 U.S.C. §§ 1346, 2671-2680, or other law? ☐ Yes ☒ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. **List ALL lawsuits in any jurisdiction and indicate the court where they were filed to the best of your ability**, including those that resulted in the assessment of a "strike" under 28 U.S.C. § 1915(g) and/or those that were dismissed for being frivolous, malicious, or for failure to state a claim (see 28 U.S.C. § 1915A; 28 U.S.C. § 1915(e)(2); Federal Rule of Civil Procedure 12(b)(6)). FAILURE TO FULLY DISCLOSE YOUR LITIGATION HISTORY, INCLUDING "STRIKES," MAY RESULT IN SANCTIONS THAT INCLUDE DISMISSAL OF THIS ACTION.

1. Parties to previous lawsuits: *N/A*
Plaintiff(s):

Defendant(s): *N/A*

2. Court (if federal court, name of the district; if state court, name of the county): *N/A*

3. Docket number: *N/A*

4. Name of Judge to whom case was assigned: *N/A*

5. Type of case (for example: Was it a habeas corpus or civil rights action?): *N/A*

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): *N/A*

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

- (1) THAT, ON THURSDAY, JANUARY 6-2022, IN THE MADISON COUNTY JAIL, EDWARDSVILLE, ILLINOIS, THE ACT OF 'DELIBERATE INDIFFERENCE' WAS COMMITTED, BY JOHN LAKIN AND STAFF IN THAT, THEY PLACED A "COVID-INFECTED" PERSON IN THE CELL WITH PLAINTIFF, DAVID F. BROWN #17579, THEREFORE, VIOLATING HIS UNITED STATES AND ILLINOIS CONSTITUTIONAL RIGHTS, UNDER BOTH THE 'EIGHTH' AND FOURTEENTH AMENDMENTS..
- (2) THAT, ON THE SIXTH-DAY OF JANUARY, 2022, IN THE MADISON COUNTY JAIL, HERE IN EDWARDSVILLE, ILLINOIS, A COVID-19, INFECTED PERSON, NAMED "CHARLES ADCOCK, NO #92158" WAS PLACED IN THE CELL WITH THE PLAINTIFF, DAVID F. BROWN #17579, BY JOHN LAKIN AND HIS STAFF COMMITTING THE ACT OF 'CRUEL AND UNUSUAL PUNISHMENT' AGAINST SAID PLAINTIFF, VIOLATING HIS 'UNITED STATES AND ILLINOIS, CONSTITUTIONAL RIGHTS, UNDER BOTH THE 'EIGHTH' AND FOURTEENTH AMENDMENTS..
- (3) THAT ON THURSDAY, JANUARY 6-2022, IN THE MADISON COUNTY JAIL, EDWARDSVILLE, ILLINOIS, THE ACT OF 'CRUEL AND UNUSUAL PUNISHMENT, BY WAY OF DELIBERATE INDIFFERENCE', TO PLAINTIFFS, LIVING CONDITIONS WAS COMMITTED, BY JOHN LAKIN, KRISTOPHER THARP, STEPHEN ADAMS AND STAFF, AGAINST SAID PLAINTIFF, IN THAT THE DEFENDANTS PLACE A PERSON "CHARLES ADCOCK" #92158, INFECTED WITH COVID-19, IN THE CELL WITH PLAINTIFF EXPOSING HIM TO A DEADLY AND CONTAGIOUS VIRUS, THEREFORE MAKING THE CONDITIONS OF HIS CONFINEMENT, 'INHUMANE' IN VIOLATION OF THE PLAINTIFFS' UNITED STATES AND ILLINOIS CONSTITUTIONAL RIGHTS UNDER THE 'EIGHTH AND FOURTEENTH AMENDMENTS..
- (4) THAT, ON THURSDAY, JANUARY 6-2022, IN THE MADISON COUNTY JAIL, HERE IN EDWARDSVILLE ILLINOIS, 'CHARLES ADCOCK, NO #92158, WAS DIAGNOSED, WITH "COVID-19, A HIGHLY DEADLY AND CONTAGIOUS VIRUS, BY THE (H.C.U.) HERE IN THE MADISON COUNTY, JAIL, EDWARDSVILLE, IL. AND WAS PLACED IN THE CELL/BACK IN THE CELL, WITH THE PLAINTIFF, DAVID F. BROWN, #17579, BY LT. JOHN DOE, SGT. JOHN DOE, WHOM ONE OR THE OTHER, WHILE ACTING, SHIFT COMMANDER (6pm to 6am.) AND OFFICER, DECKER-BADGE NO# UNKNOWN COMMITTED, THE ACT OF 'CRUEL AND UNUSUAL PUNISHMENT' BY WAY OF THEIR 'DELIBERATE INDIFFERENCE' TO DAVID F. BROWN'S, CONDITIONS OF CONFINEMENT, LIFE, HEALTH, SAFETY AND WELL BEING, THEREFORE, VIOLATING HIS 'UNITED STATES' AND ILLINOIS, CONSTITUTIONAL RIGHTS, UNDER BOTH THE 'EIGHTH' AND FOURTEENTH AMENDMENTS..

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I WOULD LIKE FOR THIS HONORABLE COURT, TO HOLD THE DEFENDANTS ACCOUNTABLE, AND LIABLE FOR THERE UNCONSTITUTIONAL ACTIONS, AND IN ACTIONS AGAINST PLAINTIFF, AN AWARD DECLARATORY AND INJUNCTIVE RELIEF TO PLAINTIFF AS WELL AS \$700,000, IN COMPENSATORY AND PUNITIVE DAMAGES, AND BE RESPONSIBLE FOR ALL COURT COST AND ATTORNEY FEES.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 10-9-2022
(date)

David F. Brown
Signature of Plaintiff

405 RANDLE ST
Street Address

DAVID F. BROWN
Printed Name

EDWARDSVILLE, IL, 62025
City, State, Zip

#17579
Prisoner Register Number

Signature of Attorney (if any)

7. Approximate date of filing lawsuit: *N/A*
8. Approximate date of disposition: *N/A*
9. Was the case dismissed as being frivolous, malicious, or for failure to state a claim upon which relief may be granted and/or did the court tell you that you received a "strike?" *N/A*

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☐ Yes ☒ No

- C. If your answer is YES,
1. What steps did you take? *N/A*

2. What was the result? *N/A*

- D. If your answer is NO, explain why not. *THE FACT IS THAT, MY ISSUE/ COMPLAINT, HAS AND IS "UNRESOLVABLE". THE GRIEVANCE PROCEDURE, SERVES NO, PURPOSE, HERE BECAUSE IT, CAN'T RIGHT THE WRONG...*

- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? *N/A* ☐ Yes ☐ No

- F. If your answer is YES,
1. What steps did you take? *N/A*

2. What was the result? *NA*

G. If your answer is NO, explain why not. *NA*

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

*THERE IS NO [ADMINISTRATIVE REMEDY] TO MY ISSUE/
COMPLAINT... SINCE THE 'HEALTH CARE UNIT' HERE IN THE
MADISON COUNTY IRL, CORRECTIONAL CENTER, EDWARDSVILLE, IL,
DIAGNOSED "MR. ADCOCK #92158" WITH THE 'CORONAVIRUS/COVID-19,
THE "ADMINISTRATIVE REMEDY" WAS TO FOLLOW THE 'QUARANTINE' AND
TESTING PROTOCOLS' HANDLED DOWN BY ILLINOIS 'GOV. J.B. PRITZKER'
BY WAY OF 'EXECUTIVE ORDER (2020-50) WHEN THE 'ADMINISTRATIVE
AND STAFF, AT THE FACILITY, FAILED TO DO SO, THE 'ADMINI-
STRATIVE REMEDY' THAT COULD HAVE BEEN, WAS NOT... THE
GUARD, OFFICER, DECKER, BADGE NO. #UNKNOWN, CAME AND PLACED
A PAPER IN THE (FOYER) OF THE BLOCK (4) STATING "QUARANTINE"
14-DAYS, NO ONE IN, NO ONE OUT," THEN, FIVE MINS. LATER HE
BROUGHT MR. ADCOCK, BACK, AND PLACED HIM BACK IN THE CELL (4)
WITH ME... THIS MADE ANY TYPE OF "REMEDY" UNATTAINABLE
THEREFORE, MAKING THE 'GRIEVANCE PROCEDURE' IRRELEVANT
AT THAT POINT... WHAT WAS DONE, COULDN'T BE UNDONE...
THAT'S IT, THAT'S ALL! THANK YOU, AND HAVE A BLESSED DAY!*

UNITED STATES DISTRICT COURT

FOR THE

SOUTHERN DISTRICT OF ILLINOIS

MEMORANDUM OF LAW

1) ON THURSDAY, JANUARY 6-2022, IN THE COUNTY OF MADISON, AT THE MADISON COUNTY JAIL, IN EDWARDSVILLE, ILLINOIS, JOHNN LAKIN, SHERIFF OF MADISON COUNTY, COMMITTED THE ACT OF 'DELIBERATE INDIFFERENCE' AGAINST DAVID F. BROWN, A PRETRIAL DETAINEE, IN THAT SAID DEFENDANT, JOHNN LAKIN, IN HIS OFFICIAL CAPACITY AS 'SHERIFF' OF THE MADISON COUNTY JAIL, FAILED TO PROVIDE PLAINTIFF, DAVID F. BROWN #17579, A PRETRIAL DETAINEE "HUMANE" CONDITIONS OF CONFINEMENT, BY PLACING (MR. CHARLES ADCOCK #92158) A PERSON, DIAGNOSED WITH THE "CORONAVIRUS/COVID-19, A HIGHLY CONTAGIOUS AND DEADLY VIRUS, BACK IN THE CELL WITH HIM (PLAINTIFF, DAVID F. BROWN) EXPOSING AND SUBJECTING SAID PLAINTIFF TO THE HIGHLY CONTAGIOUS VIRUS, FOR WHICH HE CONTRACTED, THEREFORE, VIOLATING THE PLAINTIFFS' UNITED STATES AND ILLINOIS CONSTITUTIONAL RIGHTS UNDER THE 'EIGHTH' AND 'FOURTEENTH' AMENDMENTS. NOTE: A PRISON OFFICIAL'S "DELIBERATELY-INDIFFERENT" WHEN HE/SHE KNOWS OR SHOULD HAVE KNOWN OF A SUFFICIENTLY SERIOUS DANGER TO AN INMATE/ PRETRIAL

DETAINEE] SEE: JOHNS V. QUINN, 960 F.2d 354, 360-361 (CA3, 1992) JOHN LAKIN, SHERIFF OF MADISON COUNTY, KNEW THE 'SERIOUSNESS' OF 'COVID-19' AND STILL DISPLAYED A BLATANT DISREGARD, FOR THE PLAINTIFFS (LIFE, HEALTH, SAFETY AND WELL-BEING) BY LETTING MEMBERS OF HIS STAFF, PLACE A 'COVID-19, INFECTED PERSON IN CELL WITH 'PLAINTIFF DAVID F. BROWN. NOTE: [AM, OFFICIAL ACTS WITH-- 'DELIBERATE INDIFFERENCE', WHEN HE OR SHE IS AWARE OF A SUBSTANTIAL RISK OF SERIOUS INJURY/HARM TO THE 'PLAINTIFF/PRETRIAL DETAINEE AND NEVER THE LESS FAILS TO TAKE APPROPRIATE ACTION/STEPS TO PROTECT THE 'PLAINTIFF/PRETRIAL DETAINEE'] SEE: BUTER V. COTTEY, 285 F.3d 601, 605 (7TH CIR. 2002) JONES V. MORRIS, 777 F.2d 1277 (7TH CIR. 1985) (1) KNOWING A SUBSTANTIAL RISK OF SERIOUS HARM TO A PRISONER/PRETRIAL DETAINEE EXISTS AND (2) IGNORE THAT RISK. SEE: FARMER V. BRENNAN, 511 U.S. 825, 837, 114 S.Ct. 1970, 1979, L.Ed.2d 811, 825 (1994). JOHN LAKIN, KRISTOPHER THARP, AND STEPHEN RIDINGS, KNEW OF THE 'SERIOUS' HARM THAT COVID-19, CAUSES AND STILL TURNED A BLIND EYE TO THE ISSUE AT HAND. BACKGROUND, (IN MARCH, 2020, THE WORLD HEALTH ORGANIZATION, ANNOUNCED THAT THE SPREAD OF "COVID-19," QUALIFIED AS A GLOBAL PANDEMIC. NOW IN RESPONSE, OUR 'GOVERNOR', J.B. PRITZKER, TOOK MEASURES TO REDUCE THE SPREAD AND

CONTRACTION OF THE ILLNESS THROUGHOUT THE STATE, BY WAY OF 'EXECUTIVE ORDER (2020-50) WHICH STATED THE "ISOLATION, QUARANTINE AND TESTING PROTOCOLS," FOR PRISONERS AND PRETRIAL DETAINEE'S IMPRISONED IN THE CORRECTIONAL CENTERS AND JAILS, THROUGHOUT THE COUNTIES OF THE STATE OF ILLINOIS, THEREFORE THE DEFENDANT(S) KNEW AND FAILED TO BRING THE MADISON COUNTY, ILL. CORRECTIONAL CENTER INTO 'COMPLIANCE' WITH (EXECUTIVE ORDER 2020-50) WHICH MAKES THEIR ACTIONS AND INACTIONS ALIKE THE CAUSE FOR 'DAVIDE BROWIN' CONTRACTING 'COVID-19' AND SHOULD BE HELD ACCOUNTABLE AND LIABLE FOR IT, BY THIS HONORABLE COURT. [JOHN LAKIN, IN HIS OFFICIAL CAPACITY AS SHERIFF OF THE COUNTY OF MADISON / MADISON COUNTY JAIL.] [STEPHEN RIDINGS, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY AS CAPTAIN AND MADISON COUNTY JAIL SUPERINTENDENT, AND [KRISTOPHER THARP, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY, AS CAPTAIN AND MADISON COUNTY, ILL. ADMINISTRATOR] SHOULD BE HELD, ACCOUNTABLE FOR VIOLATING, DAVIDE BROWIN'S CONSTITUTIONAL RIGHTS, AS STATED ABOVE, AND FOR THE SUBJECTION AND INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, IN VIOLATION OF -- ILLINOIS LAW...

2) ON THURSDAY JANUARY 6, 2022, ON THE (2ND) SHIFT, 6PM TO 6AM, IN THE COUNTY OF MADISON, AT THE MADISON COUNTY JAIL, IN EDWARDSVILLE, IL. IN THE CELL BLOCK OF (F-4) OVER 50, AT APPROX: 6:15 PM. THE GUARD WHOM I KNOW AS MR. WALLY, WAS MAKING HIS ROUNDS TO DO 'COURT', SAID GUARD WAS INFORMED, THAT A INMATE BY THE NAME OF 'CHARLES ADCOCK', #92158, HAD BEEN FELLING ILL SINCE MONDAY, JANUARY 3, 2022, AND WAS ASKED, COULD HE TAKE HIM (MR. ADCOCK) TO THE (H.C.U.) HEALTH CARE UNIT. THE GUARD, KNOWN AS MR. WALLY, SAID WAIT UNTIL 'COURT' IS FINISHED. AROUND 6:35 PM. MR. WALLY CAME AND TOOK 'CHARLES -- ADCOCK' #92158, TO THE HEALTH CARE UNIT, HERE IN THE MADISON COUNTY JAIL FACILITY. NOW ABOUT (15-MINUTES) LATER, A GUARD WHOM LAST NAME WAS 'DECKER', BADGE NO. # UNKNOWN, ENTERED THE FOYER OF CELL BLOCK (F-4) AND PLACED A (8 BY 11) INCH PIECE OF WHITE PAPER ON THE WALL, THAT READ, AND I QUOTE: 'QUARANTINE 14-DAYS, NO ONE IN, NO ONE OUT', AND APPROXIMATE (10-MINUTES) LATER, THE GUARD BY THE LAST NAME "DECKER, BADGE NO. # UNKNOWN BROUGHT MR. CHARLES ADCOCK #92158, BACK TO CELL BLOCK (F-4) BACK IN THE CELL WITH ME 'DAVIDE BROWNI', #17579, AND STATED THAT, MR. ADCOCK, WAS DIAGNOSED WITH 'COVID-19', AND THAT THE WHOLE CELL BLOCK, WAS ON 'QUARANTINE', STATUS FOR 'FOURTEEN DAYS', WITHOUT TESTING NO ONE ELSE FOR COVID-19, AT ALL. WITH THAT, SAID "JOHN LAHIZI, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY, AS SHERIFF OF THE COUNTY OF MADISON THE

MADISON COUNTY JAIL, STEPHEN RIDINGS, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITY AS CAPTAIN AND
SUPERINTENDENT OF THE MADISON COUNTY JAIL,
KRISTOPHER THARP, IN HIS INDIVIDUAL AND OFFICIAL
CAPACITY AS CAPTAIN AND MADISON COUNTY JAIL,
ADMINISTRATOR, COMMITTED WITH THE HELP OF
THEIR STAFF, THE ACT OF 'CRUEL AND UNUSUAL PUNISH-
MENT, AGAINST PLAINTIFF 'DAVID F. BROWN', IN THEIR
DELIBERATE INDIFFERENCE, TO HIM (DAVID F. BROWN)
CONTRACTING 'COVID-19', WHEN THE DEFENDANT(S)
ACTING UNDER COLOR OF STATE LAW, ALLOWED THEIR
SUBORDINATES^{TO} PLACE AN 'COVID-19' INFECTED PERSON
IN THE CELL WITH PLAINTIFF 'DAVID F. BROWN' AND
SUBJECTING PLAINTIFF, TO THE HIGHLY CONTAGIOUS
AND DEADLY VIRUS, FOR WHICH THE PLAINTIFF 'DAVID
F. BROWN' CONTRACTED (COVID-19) NOT THROUGH ANY FAULT
OF HIS OWN, BUT THROUGH THE BLATANT DISREGARD FOR
HIS (DAVID F. BROWN) LIFE, HEALTH, SAFETY AND WELL-
BEING, DISPLAYED BY [JOHN LAKIN, STEPHEN RIDINGS,
KRISTOPHER THARP, AND THEIR SUBORDINATES, ALONG
WITH THEIR RECKLESS DISREGARD FOR HUMAN LIFE (HIS)
THE DEFENDANT(S) ACTIONS AND INACTIONS, VIOLATED
DAVID F. BROWN'S CONSTITUTIONAL RIGHTS UNDER THE
"EIGHTH AND FOURTEENTH AMENDMENTS OF THE UNITED
STATES AND ILLINOIS CONSTITUTIONS.. SEE; FARMER
V. BRENNAN, 511 U.S. 825, 837, 114 S.Ct. 1970, 1979, L.Ed. 2d 811, 825 (1994).

IMMINENT DANGER, HAZARDOUS LIVING CONDITIONS,
HEALTH AND SAFETY VIOLATIONS [511 U.S. 825, 834 (1994)]
NOW, A PRISON/JAIL OFFICIAL'S "DELIBERATE IN-
DIFFERENCE," TO A SUBSTANTIAL RISK OF SERIOUS HARM
TO AN INMATE/PRETRIAL DETAINEE VIOLATES THE
"EIGHTH AMENDMENT," OF THE UNITED STATES CON-
STITUTION... NOTE: (SHERIFF, LAKIN; CAPTAIN/SUPER-
INTENDENT, RIDINGS; CAPTAIN/ADMINISTRATOR, THARP;
AND THEIR SUBORDINATES, WHO WERE AWARE OF THE RISK
AND LIFE THREATENING DANGERS OF 'COVID-19,' AND
CONSCIOUSLY DISREGARDED IT IN THE PROCESS... BY
PLACING "CHARLES ADCOCK #92158," A PERSON/PRETRIAL
DETAINEE, DIAGNOSED BY THE "HEALTH CARE UNIT,"
HERE IN THE MADISON COUNTY JAIL, EDWARDSVILLE
ILLINOIS, WAS DEEMED INFECTED WITH THE 'CORONA-
VIRUS/COVID-19, BACK IN THE CELL BLOCK AND BACK IN
THE CELL WITH PLAINTIFF (DAVID E. BROWN)... THE
PLAINTIFF, FURTHER STATES THAT, THE ACTIONS OF THE
JAIL OFFICIALS AND SHERIFF, RISES TO THE LEVEL OF
'CRUEL AND UNUSUAL PUNISHMENT,' AND DEPRIVED
THE PLAINTIFF (DAVID E. BROWN) OF A RIGHT SECURED
BY THE "CONSTITUTION OR LAWS OF THE UNITED-
STATES,' AND SHOULD BE HELD, ACCOUNTABLE, RESPONSIBLE,
AND LIABLE, FOR THEIR ACTIONS AND INACTIONS BY
THIS HONORABLE COURT.

3) THAT, ON THURSDAY, JANUARY-6-2022, IN THE COUNTY OF MADISON, AT THE MADISON COUNTY JAIL, IN ELWARDSVILLE, ILLINOIS; ON THE SECOND SHIFT (6PM TO 6AM) JOHN LAKIN, IN HIS 'OFFICIAL CAPACITY', AS SHERIFF, OF THE COUNTY OF MADISON, COUNTY JAIL; STEPHEN BIDDINGS, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY AS 'CAPTAIN' AND MADISON COUNTY JAIL, SUPERINTENDENT; KRISTOPHER THARP, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY, AS CAPTAIN AND MADISON COUNTY JAIL, ADMINISTRATOR; ALSO LIEUTENANT - JOHN DOE; SERGEANT - JOHN DOE, AND A GUARD, WHO'S LAST NAME IS DECKER, BADGE NO. # UNKNOW. THE DEFENDANT(S) COMMITTED THE ACT OF "CRUEL AND UNUSUAL PUNISHMENT," AGAINST PLAINTIFF (DAVID F. BROWN #17579) AND VIOLATED HIS EIGHTH AMENDMENT AND FOURTEENTH AMENDMENT RIGHT(S) GOVERNED BY THE UNITED STATES AND ILLINOIS CONSTITUTIONS, BY DISPLAYING "DELIBERATE-INDIFFERENCE," TO THE SUBSTANTIAL RISK, THAT HE (DAVID F. BROWN) COULD GET/CONTRACT 'COVID-19,' AND PLACED (CHARLES ADCOCK #92158) A PERSON DIAGNOSED WITH, THE HIGHLY CONTAGIOUS AND EVER-SO-DEADLY CORONAVIRUS/COVID-19, HERE AT THE MADISON COUNTY JAIL, ON THURSDAY, JANUARY-6-2022, AT APPROX: 6:50pm BY ITS HEALTH CARE UNIT, IN THIS COUNTY JAIL, IN THE CELL WITH PLAINTIFF (DAVID F. BROWN) WHO WASN'T

INFECTED, MAKING HIS CONDITIONS OF CONFINEMENT
(INHUMANITY). NOTE: [THE 'FARMER,' COURT EXPLAINED THAT
THE 'EIGHTH AMENDMENT,' IMPOSES DUTIES ON [PRISON/
JAIL] OFFICIALS, [I.E. 4TH 372] WHO MUST PROVIDE HUMANITY
CONDITIONS OF CONFINEMENT; PRISON OFFICIALS
MUST ENSURE THAT INMATES RECEIVE SANITATION, PER-
SONAL SAFETY AND MUST TAKE REASONABLE MEASURES TO
'GUARANTEE,' THE SAFETY OF THE INMATES... FARMER, 511
U.S. AT 832, 114 S.Ct. 1970] NOW THE DEFENDANT(S) KNEW
OF THE SERIOUSNESS AND DEADLY EFFECTS OF A PER-
SON CONTRACTING 'COVID-19,' AND HOW CONTAGIOUS
THE VIRUS WAS AND COULD BE, AND STILL THEY
(THE DEFENDANT(S)) JOHN LAKIN, STEPHEN RIDINGS,
KRISTOPHER THARP, LIEUTENANT- JOHN DOE, SERGEANT-
JOHN DOE AND OFFICER GUARD, WHO'S LAST NAME
WAS DECKER, BADGE NO. # UNKNOW, PLACED (CHARLES
ADCOCK) A PRETRIAL DETAINEE, INFECTED WITH
COVID-19, BACK IN THE CELL BLOCK (F-4) AND BACK IN
THE CELL WITH PLAINTIFF (DAVID F. BOLLIN) WHO
WASN'T INFECTED, THEREBY ACTING WITH "DELI-
BERATE INDIFFERENCE," TO HIS "CONDITIONS OF CON-
FINEMENT, "HEALTH AND SAFETY, THEREFORE VIOLATING
THE PLAINTIFF 'EIGHTH AMENDMENT' RIGHT(S) UNDER
THE UNITED STATES CONSTITUTION, THAT 'PROHI-
BITION AGAINST 'CRUEL AND UNUSUAL PUNISHMENT'...
THE COURT HELD "A PRISON OFFICIAL CAN BE FOUND

'LIABLE' UNDER THE EIGHTH AMENDMENT FOR
DEPRIVING AN INMATE HUMAN RIGHTS OF
CONFINEMENT IF HE OR SHE KNOWS OF AND DIS-
REGARDS AN EXCESSIVE RISK TO INMATES' HEALTH OR
SAFETY ID AT 837, 114, S.C.E. 1970... THIS ACT WAS COM-
PLETED WHEN THE DEFENDANT(S) WITH 'RECKLESS IN-
DIFFERENCE' TO HUMAN LIFE (DAVID F. BROWN) AND
PLACED COVID-19-INFECTED (CHARLES ADCOCK) BACK
IN THE CELL WITH HIM/D DAVID F. BROWN, AND HE
CONTRACTED COVID-19, AND SHOULD BE HELD "RESPONSIBLE,
ACCOUNTABLE AND LIABLE FOR THERE ACTIONS & INSTRUCTIONS
THAT LED TO PLAINTIFF (DAVID F. BROWN) CONTRACT-
ING, 'COVID-19' A DEADLY VIRUS (CORONA), FOR WHICH HE
THE PLAINTIFF (DAVID F. BROWN) STILL SUFFERS FROM
THE 'EFFECTS' OF 'COVID-19' TO THIS DAY...

4) ON THURSDAY, JANUARY 6-2022, IN THE COUNTY OF MAD-
ISON, AT THE MADISON COUNTY JAIL, HERE IN EDWARD-
SVILLE, ILLINOIS, ON THE SECOND SHIFT (6 PM TO 6 AM)
AT ABOUT (6:35 PM) AFTER COUNT. THE GUARD, THAT I KNOW
ONLY AS "TRULLY", TOOK INMATE "CHARLES ADCOCK" NO. 92158,
TO THE "HEALTH CARE UNIT", HERE IN THE MADISON-
COUNTY JAIL, WHERE HE WAS 'DIAGNOSED' WITH THE 'CORONA-
VIRUS/COVID-19, AFTERWARDS ABOUT (10-MINUTES) LATER
CO. DECKER, STEPPED INTO THE 'FOYER' OF CELL-BLOCK (F-4)
AND PLACED A 'QUARANTINE' PAPER ON THE WALL STATING

(14-DAYS) NO ONE IN, AND NO ONE OUT) THEN APPROX:
(10-MINUTES) LATER, CO. DECKER, BROUGHT (CHARLES -
ADCOCK #92158) WHO WAS INFECTED WITH 'COVID-19',
BACK TO THE CELL BLOCK (F-4) AND PLACED HIM BACK
IN THE CELL WITH PLAINTIFF (DAVID F. BROWN)
#17579, A NON-INFECTED, PRETRIAL DETAINEE
AT THE TIME, "ENDANGERING HIS LIFE; CREATING
UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT,
AND FAILING TO PROTECT PLAINTIFF (DAVID F. BROWN)
THE HIGHLY CONTAGIOUS AND DEADLY "CORONAVIRUS/
COVID-19," COMMITTED THE ACT OF "CRUEL AND UNUSUAL
PUNISHMENT," BY THERE "DELIBERATE INDIFFERENCE,"
"TO THE SUBSTANTIAL RISK, THAT 'COVID-19,' IMPOSED
ON THE "LIFE, HEALTH, AND SAFETY," OF PLAINTIFF (DAVID
F. BROWN) AND THAT HE COULD CONTRACT IT, FOR WHICH
HE DID, VIOLATES HIS UNITED STATES AND ILLINOIS
CONSTITUTIONAL RIGHTS UNDER BOTH THE "EIGHTH,"
AND FOURTEENTH AMENDMENTS, [U.S. CONST. AMEND. VIII,
XIV; ILL. CONST. 1970, ARTICLE I, SECTION 11] NOW, ON THE
SECOND SHIFT, HERE IN THE MADISON COUNTY JAIL,
FROM (6 PM TO 6 AM.) EITHER THE "LIEUTENANT," OR
THE "SERGEANT," IS APPOINTED AS ACTING SHIFT...
COMMANDER FOR THAT SHIFT. I'M STATING THIS
BECAUSE, EITHER "LIEUTENANT-JOHN DOE(1) OR SER-
GEANT-JOHN DOE(2) GAVE THE ORDER FOR (CHARLES AD-
COCK #92158) AFTER BEING DIAGNOSED WITH THE

'CORONAVIRUS/COVID-19,' TO BE PLACED BACK ON IN
CELL-BLOCK (F-4) AND BACK IN THE CELL WITH (DAVID
F. BROWN) THE PLAINTIFF, KNOWING THE 'SUBSTAN-
TIAL RISK,' THAT HE (DAVID F. BROWN) COULD GET 'COVID-
19' AND BLATANTLY DISREGARDED IT, THEREBY DIS-
PLAYING AN 'BECKLESS INDIFFERENCE,' TO 'HUMAN
LIFE,' AND SHOULD BE HELD ACCOUNTABLE AND LIBLE
FOR VIOLATING PLAINTIFF (DAVID F. BROWN'S) 'EIGHTH,
AND FOURTEENTH' AMENDMENT RIGHTS, AND ACTING
WITH INTENT TO DO HARM, IN THAT [THE SUPERVISOR
/ACTING SHIFT COMMANDER, EITHER "LIEUTENANT"
JOHN DOE (1) OR "SERGEANT" JOHN DOE (2) ON THURSDAY,
JANUARY-6-2022, IN THE COUNTY OF MADISON, AT THE
MADISON COUNTY JAIL, IN EDWARDSVILLE, ILLI-
NOIS, PERSONALLY JOINED THE SUBORDINATE(S) IN
VIOLATING THE PLAINTIFFS' RIGHTS /DIRECTED
OTHERS TO VIOLATE THE PLAINTIFFS' RIGHTS OR AS THE
PERSON IN CHARGE HAD KNOWLEDGE OF LUCOR'S IT-
TUTIONAL CONDUCT AND CONDONED IT... NOTE: DELIBE-
RATE INDIFFERENCE OCCURS WHEN A DEFENDANT REALIZES
THAT A SUBSTANTIAL RISK OF SERIOUS HARM TO A PRISONER
EXISTS, BUT THEN DISREGARDS THAT RISK. SEE: FARMER
V. BRENNAN, 511 U.S. 825, 837, 114 S.Ct. 1970, 128 L.Ed. 2d 811 (1994) AND
THEREBY, PLAINTIFF (DAVID F. BROWN) WAS DEPRIVED, UNDER
COLOR OF LAW, OF HIS CITIZEN'S RIGHTS SECURED BY THE 'CON-
STITUTION AND LAWS' OF THE UNITED STATES... SEE:

LIES V. ATKINS, 487 U.S. 42 (1988) AND DUHANN V. WADLEY, 195 F.3d 1007, 1009 (8TH CIR. 1999). NOW THE PLAINTIFF, STATES, THAT THE DEFENDANT(S) DELIBERATELY, IGNORED THE MEDICAL INFORMATION AVAILABLE TO THEM; FAILED TO MINIMIZE THE RISK OF THE "PLAINTIFF," CONTRACTING COVID-19; FAILED TO PROVIDE HUMANE CONDITIONS OF CONFINEMENT; FAILED TO TAKE REASONABLE MEASURES TO GUARANTEE, THE HEALTH AND SAFETY, OF THE PLAINTIFF, AND FAILED TO PROTECT, SAID PLAINTIFF (DAVID E. BROWN) FROM COVID-19, DUE TO THERE 'DELIBERATE INDIFFERENCE,' TO THE RISK OF (DAVID E. BROWN) CONTRACTING / GETTING "COVID-19," AND CONSCIOUSLY DISREGARDED IT NONE-THE-LESS.

IN, CONCLUSION, THE PLAINTIFF, ASKS THIS HONORABLE COURT, BY WAY OF TRIAL BY JURY, TO HOLD THE SAID DEFENDANT(S) [JOHN LAKIN / SHERIFF; CAPTAIN - STEPHEN RIDINGS / SUPER-INTENDENT; CAPTAIN - KRISTOPHER THARP / ADMINISTRATOR; LIEUTENANT - JOHN DOE (1); SERGEANT - JOHN DOE (2) AND CO: DECKER] EACH AND EVERYONE OF THEM IN THERE (INDIVIDUAL AND OFFICIAL CAPACITY) BE HELD RESPONSIBLE, ACCOUNTABLE, AND LIABLE, FOR THERE "ACTIONS," AND "IN ACTIONS," THAT CAUSED PLAINTIFF TO SUFFER, "PHYSICAL, PSYCHOLOGICAL AND BODILY HARM, ALONG WITH EMOTIONAL DISTRESS (HEAD AND BODY ACHES) STILL TO THIS DAY, AN ALLIARD PLAINTIFF DECLARATORY AND INJUNCTIVE RELIEF, AS WELL AS \$ 700,000, IN COMPENSATORY AND PUNITIVE DAMAGES...

I, CERTIFY TO THE BEST OF MY KNOWLEDGE, THAT
THE INFORMATION IN THIS AMENDED COMPLAINT
IS TRUE IN BODY AND FACT...

THIS DATE: OCT.-9-2022

RESPECTFULLY SUBMITTED,

DAVID E. BROLLINI #17579

151 David E. Brollini
405, ARNOLD SE.
EDWARDSVILLE, IL 62025

DAVID F. BROWNE #17579
405 RADULE ST.
EDWARDSVILLE, IL 62025

MAIL CLEARED
US MARSHALS

CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
750 MISSOURI AVE.
EAST ST. LOUIS, IL 62201



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OCT 17 2022

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
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